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(QA)

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United States Government
Interagency Border Inspection System



Mr. Skinner
U.S. Department of Transportation
Room 4107, Docket Number 47389
400 7th Street, SW
Washington, DC 20590

APR 5 1991

To Whom It May Concern:

The agencies involved in the Interagency Border Inspection System (IBIS) have now had an opportunity to review your proposed rulemaking, Notice 91-2, on the mandatory collection of passenger manifest information as mandated in Public Law 101-604. The following comments reflect a joint response developed by the U.S. Customs Service, The Immigration and Naturalization Service, and the Departments of State, and Agriculture.

It is important to mention that the agencies previously cited are actively using an automated system that may well address the manifest issue. Appropriately termed, the Advance Passenger Information System (APIS) provides an electronic method of receiving and processing passenger manifests. This system has been designed by the Customs Service as a subsystem of the Treasury Enforcement Communications System (TECS). With the advent of the IBIS, Customs has joined with the other federal agencies to promote and enhance APIS. At the present time, the following information can be collected and processed: Passenger Last Name, First Name, Date of Birth, Passport Number and Country of Issuance. In addition the system captures pertinent transmission data such as, the airline identification code (IATA code), the date, and the arrival location information. The system has not yet been designed to accept contact name or telephone number information. However, this information could be included in APIS with some modifications to the programs.

Since there appear to be only minor differences between your statutory requirements and APIS, we would suggest that we use this system as the means to fulfill your requirements, and that we specify a comprehensive list of data elements that must be included to fulfill Public Law 101-604. In addition, it is our opinion that an electronic transmission of APIS containing the complete passenger manifest must be provided prior to the departure of the aircraft to maximize the benefits from this requirement.

The following list indicates the joint IBIS request for data elements on an electronic passenger manifest:

Individual Passenger Data:

Last Name
First Name
Date of Birth
Nationality
Travel Document Number
Issuing Country Code for Travel Document
Passenger's Travel Origination Point (Country Code)
Contact Name
Contact Telephone Number

Some of the agencies involved in IBIS have indicated that the inclusion of "**Visa Issuing Post**", "**Date** of Visa Issuance", and "**Intended Destination** (US address or "**in** transit") information would enhance their ability to facilitate traffic.

Airline/Arrival Data:

Airline Name
Flight Number
Estimated Date of Arrival
Arrival Location

The present APIS is based on an EDIFACT format, and it is our recommendation that this method be adopted universally. If this is done, the APIS system which is already in use, is capable of addressing your new statutory requirement.

We hope this will assist you in your efforts. Should you have any questions concerning the information above, please feel free to contact me^{on} 703-440-6154.



Rod MacDonald
U.S. Customs
Director, Office of Enforcement Systems